

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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**MICHAEL J. BELLEAU,**

Plaintiff,

vs.

Case No. 12-cv-1198 (WCG)

**EDWARD F. WALL, *et al.*,**

Defendants.

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**PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

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Pursuant to Fed. R. Civ. P. 56 and Civ. L.R. 56, and upon the pleadings in this case and the declarations, proposed material facts, stipulations and the memorandum in support filed herewith, Plaintiff Michael Belleau hereby moves for summary judgment and requests that this Court grant: (1) a declaration that imposition of lifetime GPS tracking of him pursuant to Wis. Stat. § 301.48 violates his federal constitutional rights under the Ex Post Facto Clause of Article 1, Section 10; the Fourth Amendment; and the Equal Protection Clause of the Fourteenth Amendment; (2) an injunction forbidding Defendants from requiring Mr. Belleau to continue wearing a GPS device pursuant to Wis. Stat. § 301.48; and (3) any further relief this Court deems just and proper.

Dated this 16th day of February, 2015.

By:    /s Laurence J. Dupuis  
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